

**Callis, Papa, Hale, Szewczyk, Rongey & Danzinger, P.C.**

**Lance Callis**  
lc@callislaw.com

Reply to: Granite City

March 29, 2004

Mr. Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination &  
Legal Administration  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2004 MAR 30 P 12:56

Re: **MUR 5406**

Dear Mr. Jordan: Federal Election Commission  
999 East Street, NW

Enclosed please find a response to the above-captioned Complaint and a response of the Madison County Democratic Central Committee, Mac Warfield, Chairman, attached with Affidavit of Mr. Warfield.

Thank you for your cooperation in this matter.

Very truly yours,

  
Lance Callis

LC/jah  
Enclosures  
cc: Mr. Michael K. Forde  
Mr. Michael T. Beirne



John T. Papa,  
Designated Counsel

George Fulcoff  
of counsel

Todd A. Neilson  
associate

John W. Halloran  
(1962-1993)

BEFORE THE FEDERAL ELECTION COMMISSION

GERALD L. JAECKS, )  
)  
Complainant, )  
)  
Vs. ) MUR 5406  
)  
DANIEL W. HYNES, HYNES FOR SENATE, )  
19<sup>th</sup> WARD DEMOCRATIC ORGANIZATION, )  
THOMAS C. HYNES, ROSEMARY BILECKI, )  
PETER BILECKI, 43<sup>RD</sup> WARD DEMOCRATIC )  
PARTY, PEGGY A. ROTH, CHARLES R. )  
BERNARDINI, FRIENDS OF VI DALEY, )  
THOMAS S. MOORE, VI DALEY, FRIENDS )  
OF DAN HYNES, JOHN SHERIDAN, )  
MADISON COUNTY DEMOCRAT CENTRAL )  
COMMITTEE, MAC WARFIELD, SANGAMON )  
COUNTY DEMOCRATIC CENTRAL )  
COMMITTEE, PATRICK T. TIMONEY, )  
DONALD E. STEPHENS COMMITTEEMAN'S )  
FUND, BRADLEY STEPHENS and DONALD )  
E. STEPHENS, )

RESPONSE

Comes now the MADISON COUNTY DEMOCRATIC CENTRAL COMMITTEE,  
MAC WARFIELD, CHAIRMAN, by their attorneys, CALLIS, PAPA, HALE SZEWCZYK,  
RONGEY & DANZINGER, P.C., and in response to Complainant's Complaint for violations of  
the Federal Election Campaign Act states:

1. Respondents neither admit or deny any paragraph of said Complaint except  
Paragraph 23 which is the only paragraph directed to them.
2. Respondents state that with regard to Paragraph 23(a) they specifically deny any  
allegations that they violated the Federal Election Campaign Act. 2 USC §441; 11 C.F.R. §  
110.3(d).

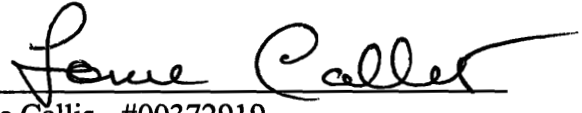
3. Respondents adopt the allegations contained in the Affidavit of Mac Warfield which is attached hereto marked "Exhibit A" and incorporated herein.

WHEREFORE, having fully answered Respondents, Madison County Democratic Central Committee, Mac Warfield, Chairman, pray that this Commission dismiss the Complaint and assess fines and costs against said Complainant to the extent provided by law for the filing of a frivolous Complaint against these Respondents.

Respectfully submitted.

CALLIS, PAPA, HALE, SZEWCZYK,  
RONGEY & DANZINGER, P.C.

BY:



Lance Callis - #00372919  
1326 Niedringhaus Avenue  
Granite City, IL 62040  
618-452-1323  
Attorney for Respondents

25044110584

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GERALD L. JAECKS,

Complainant,

Vs.

MUR 5406

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DONALD E. STEPHENS COMMITTEEMAN'S  
FUND, BRADLEY STEPHENS and DONALD  
E. STEPHENS,

Respondents.

**AFFIDAVIT OF MAC WARFIELD**

MAC WARFIELD, duly sworn on oath on personal knowledge, hereby deposes and states as follows:

1. I am the Chairman of the Madison County Democratic Central Committee ("Madison County Committee"), a local party committee.
2. The Madison County Committee contributed \$1,000.00 to Hynes for Senate, a federal authorized committee, on or about August 27, 2003. The Madison County Committee did not contribute any other funds to any federal candidate in 2003.

3. At the time of that contribution, the Madison County Committee had received sufficient funds subject to the limitations and prohibitions of the Federal Election Campaign Act and the requirements of 11 C.F.R. § 300.31 to make such a contribution, as required by 11 C.F.R. § 102.5(b)(2)(ii).

FURTHER AFFIANT SAYETH NOT

Dated this 26<sup>th</sup> day of March, 2004.

Mac Warfield  
MAC WARFIELD

SWORN and SUBSCRIBED to before

me this 26<sup>th</sup> day of March, 2004.

Joann Heien  
NOTARY PUBLIC

